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May 4, 2017

VIA ECF

The Honorable Dora L. Irizarry United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: U.S. v. Dan Zhong and Landong Wang, 16-cr-614 (DLI)

Dear Chief Judge Irizarry:

Pursuant to Your Honor's Individual Rules, we hereby request a pre-motion conference to file a motion to withdraw from the representation of Dan Zhong in the above-captioned case. This request is also made on behalf of Thomas Fitzpatrick.

On April 28, 2017, attorneys from Proskauer Rose LLP filed notices of appearance to represent Mr. Zhong. Proskauer Rose will be substituting for Dorsey & Whitney and Thomas Fitzpatrick.

The only dates I am unavailable for a conference are May 5th and 8th. I will be in California on both dates. Mr. Fitzpatrick is unavailable on May 9th.

Respectfully submitted,

Nathaniel H. Akermar